



Order Filed on February 20, 2020
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)
McGovern Legal Services, LLC
By: Marlena S. Diaz-Cobo, Esq.
850 Carolier Lane
North Brunswick, NJ 08902
(732) 246-1221
Attorneys for Sixty Acre Reserve Condominium
Association, Inc.

In Re:

JOSEPH LOMBARDI AND LORIE A. LOMBARDI

Case No.: 19-25502

Judge: Michael B. Kaplan

Chapter: 13

CONSENT ORDER RESOLVING CREDITOR'S MOTION FOR STAY RELIEF

The relief set forth on the following pages, numbered one (1) through four (4) is hereby **ORDERED**.

DATED: February 20, 2020

A handwritten signature in black ink, appearing to read "Michael B. Kaplan".

Honorable Michael B. Kaplan
United States Bankruptcy Judge

McGOVERN LEGAL SERVICES, LLC
BY: MARLENA S. DIAZ-COBO, ESQ.
850 CAROLIER LANE
NORTH BRUNSWICK, NEW JERSEY 08902
(732) 246-1221

ATTORNEYS FOR SIXTY ACRE RESERVE CONDOMINIUM ASSOCIATION, INC.

In re:

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
IN PROCEEDINGS UNDER CHAPTER 13
OF THE BANKRUPTCY CODE

JOSEPH LOMBARDI AND
LORIE A. LOMBARDI

CASE NO.: 19-25502-MBK

Debtors.

CONSENT ORDER

CONSENT ORDER RESOLVING CREDITOR'S MOTION FOR STAY RELIEF

THIS MATTER having been brought before the court by McGovern Legal Services, LLC, attorneys for creditor, Sixty Acre Reserve Condominium Association, Inc. (the "Association"), by way of a Motion for Stay Relief and the parties having consented to the relief set forth herein, and for good cause shown and no cause to the contrary appearing;

IT IS ORDERED, ADJUDGED AND DECREED THAT the Debtors are indebted to the Association in the amount of \$2,086.00 in post-petition maintenance fees, late fees and attorneys' fees related to the Association's attempts to collect unpaid post-petition fees through January 30, 2020 (the "Total Due"). The Total Due is detailed below:

Maintenance Fees (9/1/19-1/1/20):	\$1,090.00
Late Fees:	\$45.00
Legal (work related to post-petition default through 1/30/2020, including filing fee):	<u>\$951.00</u>

Total:

\$2,086.00

IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT the Debtors shall pay the Association \$450.00 on or before February 15, 2020. Thereafter, the Debtors shall pay the Association \$272.66 on or before March 1, 2020, \$272.66 on or before April 1, 2020, \$272.66 on or before May 1, 2020, \$272.66 on or before June 1, 2020, \$272.66 on or before July 1, 2020 and \$272.70 on or before August 1, 2020 (the "Monthly Cure Payments"). The Monthly Cure Payments shall be paid by certified check made payable to Sixty Acre Reserve Condominium Association, Inc. and received by McGovern Legal Services, LLC, 850 Carolier Lane, North Brunswick, NJ 08902 on or before the first of each month until the Total Due is satisfied.

IT IS FURTHER ORDRED, ADJUDGED AND DECREED THAT the Debtors shall maintain their post-petition assessments and other post-petition obligations as they become due and owing to the Association commencing on February 1, 2020; and

IT IS FURTHER ORDERED, ADJUDGED AND DECREED THAT if the Debtors fail to make the immediate payment specified above or fail to make any regular monthly payment or the additional monthly cure payment within thirty (30) days of the date the payments are due, then the Association may obtain an Order Vacating the Automatic Stay as to the Collateral by filing, with the Bankruptcy Court, a Certification specifying the Debtors' failure to comply with this order. At the time the Certification is filed with the court, a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and the Debtors' attorney.

**WE HEREBY CONSENT TO THE FORM
AND ENTRY OF THIS CONSENT ORDER:**

McGovern Legal Services, LLC
Attorneys for Sixty Acre Reserve
Condominium Association, Inc.


MARLENA S. DIAZ-COBO, ESQ.

2/10/2020
DATE


MARC C. CAPONE, ESQ.
Attorney for Debtor

2/9/20
DATE

Certificate of Notice Page 9 of 9

United States Bankruptcy Court
District of New JerseyIn re:
Joseph Lombardi
Lorie A Lombardi
DebtorsCase No. 19-25502-MBK
Chapter 13**CERTIFICATE OF NOTICE**

District/off: 0312-3

User: admin
Form ID: pdf903Page 1 of 1
Total Noticed: 1

Date Rcvd: Feb 21, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Feb 23, 2020.

db/jdb +Joseph Lombardi, Lorie A Lombardi, 17 London Drive, Jackson, NJ 08527-2615

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Feb 23, 2020

Signature: /s/Joseph Speetjens**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on February 21, 2020 at the address(es) listed below:

Albert Russo docs@russotrustee.com
 Aleisha Candace Jennings on behalf of Creditor Nationstar Mortgage LLC d/b/a Mr. Cooper
 ajennings@rasflaw.com
 Aleisha Candace Jennings on behalf of Creditor U.S. Bank Trust National Association
 ajennings@rasflaw.com
 Denise E. Carlon on behalf of Creditor Harley-Davidson dcarlon@kmlawgroup.com,
 bkgroup@kmlawgroup.com
 Marc C Capone on behalf of Joint Debtor Lorie A Lombardi mcapone@gbclawgroup.com,
 docs@caponeandkeefe.com,ecf@gbclawgroup.com;e4eaf5f23@maildrop.clio.com;mcapone@gbclawgroup.com
 Marc C Capone on behalf of Debtor Joseph Lombardi mcapone@gbclawgroup.com,
 docs@caponeandkeefe.com,ecf@gbclawgroup.com;e4eaf5f23@maildrop.clio.com;mcapone@gbclawgroup.com
 Marlena S. Diaz-Cobo on behalf of Creditor Sixty Acre Reserve Condominium Association, Inc.
 collections@theassociationlawyers.com
 Melissa N. Licker on behalf of Creditor Nationstar Mortgage LLC d/b/a Mr. Cooper
 NJ_ECF_Notices@mccalla.com
 Ramanjit K. Chawla on behalf of Creditor State Of New Jersey Division Of Taxation
 ramanjit.chawla@dol.lps.state.nj.us
 Rebecca Ann Solarz on behalf of Creditor Nationstar Mortgage LLC D/B/A Mr. Cooper
 rsolarz@kmlawgroup.com
 Shauna M Deluca on behalf of Creditor U.S. Bank Trust National Association sdeluca@rasflaw.com
 U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 12